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OCT - 5 2017

U.S. District Court  
Eastern District of MO

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
DIVISION

KEVIN MOORE  
NAME OF THE PLAINTIFF

- vs -

ST LOUIS COMMUNITY  
COLLEGE

Case No.

JURY TRIAL DEMANDED

YES \_\_\_ NO \_\_\_

NAME OF THE DEFENDANT OR  
DEFENDANTS (Enter above the full name(s) of  
ALL defendant(s) in this lawsuit. Please  
attach additional sheets if necessary.

**EMPLOYMENT DISCRIMINATION COMPLAINT**

1. This employment discrimination lawsuit is based on (check only those that apply):

☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin.  
**NOTE:** *In order to bring suit in federal district court under Title VII, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

☐ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age (age 40 or older).  
**NOTE:** *In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*

☐ American with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.  
**NOTE:** *In order to bring suit in federal district court under the American with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, et seq., for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

**NOTE:** In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or agency.

Other (Describe)

**PARTIES**

2. Plaintiff's name: KEVIN MOORE

Plaintiff's address: 6815 TROIS CT

Street address or P.O. Box

FLORISSANT MO 63033

City/ County/ State/Zip Code

(314) 718-8064

Area code and telephone number

3. Defendant's name: ST LOUIS COMMUNITY COLLEGE

Defendant's address: 300 S. BROADWAY

Street address or P.O. Box

ST. LOUIS MO 63102

City/County/State/ Zip Code

Area code and telephone number

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A SEPARATE SHEET OF PAPER.**

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

\_\_\_\_\_  
(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

NOV. 2015

**ADMINISTRATIVE PROCEDURES**

6. Did you file a charge of discrimination against the defendant(s) with the Missouri Commission on Human Rights?

☒ Yes Date filed: \_\_\_\_\_

☐ No

7. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

☒ Yes Date filed: \_\_\_\_\_

☐ No

8. Have you received a Notice of Right-to-Sue Letter?

☒ Yes

☐ No

If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination, check one of the following:

☐ 60 days or more have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

☐ fewer than 60 days have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

**NATURE OF THE CASE**

10. The conduct complained of in this lawsuit involves (check only those that apply):

☐ failure to hire me

☒ termination of my employment

☐ failure to promote me

☐ failure to accommodate my disability

☒ terms and conditions of my employment differ from those of similar employees

☒ retaliation

☐ harassment

☐ other conduct (specify): \_\_\_\_\_

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Did you complain about this same conduct in your charge of discrimination?

☒ Yes

☐ No

11. I believe that I was discriminated against because of my (check all that apply):

☒ race

☐ religion

☐ national origin

☒ color

☐ gender

☐ disability

☐ age (my birth date is: \_\_\_\_\_)

☐ other: \_\_\_\_\_

Did you state the same reason(s) in your charge of discrimination?

☒ Yes

☐ No

12. State here, as briefly and clearly as possible, the essential facts of your claim. Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

I WAS WARN ABOUT AN UNWARRANTED BREAK BUT  
GET A SUSPENSION. TONY BEAUR WAS CAUGHT  
SLEEPING ON THE SEVERAL TIMES AND WAS ALLOWED  
TO FILE A LAST GRIEVANCE FORM WHICH HE VIOLATED  
AND STILL HAS HIS JOB. MARK MARTCHINK WAS  
TOLD BY SCOTT MARTIN NOT TO CLOCK-IN WHEN  
LATE SO HE WOULDN'T GET A SUSPENSION OR  
TERMINATED

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper appears to be from a notebook or a standard ruled sheet of paper. There is no handwriting or other markings on the page.

(Attach additional sheets as necessary).



13. The acts set forth in paragraph 12 of this complaint:

☒ are still being committed by the defendant.

☐ are no longer being committed by the defendant.

☐ may still be being committed by the defendant.

**REQUEST FOR RELIEF**

State briefly and exactly what you want the Court to do for you. Make no legal arguments;  
cite no cases or statutes.

FINE THE COLLEGE FOR THEIR ACTIONS  
AND PAY ME FOR THEIR DISCRIMINATION  
TOWARDS ME

Signed this 5 day of OCT, 2017.

Kevin Moore  
Signature of Plaintiff